



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH
F. #2022R01030

*610 Federal Plaza
Central Islip, New York 11722*

June 13, 2023

By ECF

The Honorable Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. George Anthony Devolder Santos
Criminal Docket No. 23-197 (JS)

Dear Judge Seybert:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a stipulated protective order that limits the disclosure of certain sensitive material in the above-referenced case. Due to the nature of the conduct at issue in this matter, unrestricted disclosure of certain information could result in the dissemination of the personally identifiable information of third parties and witnesses or information related to ongoing investigations or uncharged individuals. Granting the attached protective order will allow the government to produce these materials expeditiously, without the need for extensive redacting, while addressing the aforementioned concerns, including the concerns of third parties whose personally identifiable information is contained within these materials.

Accordingly, the government and counsel for the defendant have jointly agreed to a stipulated protective order, which is attached hereto. For the foregoing reasons, the government respectfully requests that the Court so-order the attached stipulated protective order.

Respectfully submitted,

BREON PEACE
United States Attorney
Eastern District of New York

By: *Ryan C. Harris*
Ryan C. Harris
Anthony Bagnuola
Laura Zuckerwise
Assistant U.S. Attorneys
(718) 254-7000

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

By: *Jolee Porter*
Jolee Porter
Jacob R. Steiner
Trial Attorneys
(202) 514-1412

cc: Clerk of the Court (JS) (by ECF)